

# **Exhibit D**

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**Subject:** Re: Winklevoss Capital Fund, LLC v. Charles Shrem: Subpoenas  
**Date:** Wednesday, March 27, 2019 at 8:53:25 AM Pacific Daylight Time  
**From:** Tyler Meade  
**To:** Donald Pepperman, Teresa Huggins, Brian Klein  
**CC:** Sam Ferguson, Annie Decker, Seena Forouzan  
**Attachments:** image001.jpg, image002.jpg, image003.png, image004.jpg, image005.jpg

Donald,

You haven't responded to my email below. Please do so.

Thanks,

Tyler



TYLER MEADE | THE MEADE FIRM p.c.  
12 FUNSTON AVE., SUITE A | SAN FRANCISCO, CA 94129  
111 BROADWAY, SUITE 2002 | NEW YORK, NY 10006  
415-724-9600

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**From:** Tyler Meade <tyler@meadefirm.com>

**Date:** Saturday, March 23, 2019 at 4:22 PM

**To:** Donald Pepperman <Dpepperman@bakermarquart.com>, Teresa Huggins <thuggins@bakermarquart.com>, Brian Klein <bklein@bakermarquart.com>

**Cc:** Sam Ferguson <sam@meadefirm.com>, Annie Decker <annie@meadefirm.com>, Seena Forouzan <seena@meadefirm.com>

**Subject:** Re: Winklevoss Capital Fund, LLC v. Charles Shrem: Subpoenas

Donald,

Please identify by approximate date and subject matter what communications you claim I had with your client.

Also, your client testified that I spoke to him while he was represented by counsel. Please identify which counsel.

Thanks,

Tyler Meade



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**From:** Donald Pepperman <Dpepperman@bakermarquart.com>  
**Date:** Thursday, March 21, 2019 at 4:26 PM  
**To:** Tyler Meade <tyler@meadefirm.com>, Teresa Huggins <thuggins@bakermarquart.com>, Brian Klein <bklein@bakermarquart.com>  
**Cc:** Sam Ferguson <sam@meadefirm.com>, Annie Decker <annie@meadefirm.com>, Seena Forouzan <seena@meadefirm.com>  
**Subject:** RE: Winklevoss Capital Fund, LLC v. Charles Shrem: Subpoenas

Tyler:

In response to your inquiries: (1) you are an essential percipient fact witness as to various significant facts that either serve to prove or disprove various claims and defenses asserted in this civil litigation; (2) an outline of the most significant topics for your deposition are listed in the attached; and (3) you have specific and personal knowledge with respect to the listed topics and are identified as the sender and author of your July 23, 2013 letter to Mr. Shrem. Other party and non-party witnesses have been deposed touching on a few of these subjects but their recollections were not clear; they lacked personal knowledge; their testimony would not be binding or could be hearsay; and/or your firm obstructed our efforts to obtain some of this critical information. We are not aware of any "less obtrusive methods" of obtaining this probative and essential information needed to effectively defend Mr. Shrem's in this case. I trust this answers your inquiries.

Don

**Donald R. Pepperman**

**Partner**

**BAKER MARQUART LLP**

dpepperman@bakermarquart.com

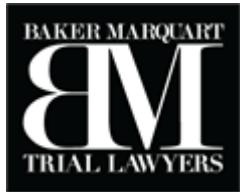
777 S. Figueroa Street

Suite 2850

Los Angeles, California 90017

TEL 424.652.7804

FAX 424.652.7850  
[www.bakermarquart.com](http://www.bakermarquart.com)



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**From:** Tyler Meade <[tyler@meadefirm.com](mailto:tyler@meadefirm.com)>  
**Sent:** Monday, March 18, 2019 11:43 AM  
**To:** Teresa Huggins <[thuggins@bakermarquart.com](mailto:thuggins@bakermarquart.com)>; Donald Pepperman <[Dpepperman@bakermarquart.com](mailto:Dpepperman@bakermarquart.com)>; Brian Klein <[bklein@bakermarquart.com](mailto:bklein@bakermarquart.com)>  
**Cc:** Sam Ferguson <[sam@meadefirm.com](mailto:sam@meadefirm.com)>; Annie Decker <[annie@meadefirm.com](mailto:annie@meadefirm.com)>; Seena Forouzan <[seena@meadefirm.com](mailto:seena@meadefirm.com)>  
**Subject:** FW: Winklevoss Capital Fund, LLC v. Charles Shrem: Subpoenas

Counsel,

I write to begin the process of meeting and conferring on the subpoena for my deposition. Please explain your factual basis for seeking this deposition, the topics you seek to cover, and why you think a deposition of me is required (as opposed to less obtrusive methods of obtaining the same information/making the same point).

-Tyler



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**From:** Tyler Meade <[tyler@meadefirm.com](mailto:tyler@meadefirm.com)>  
**Date:** Friday, March 15, 2019 at 3:56 PM  
**To:** Teresa Huggins <[thuggins@bakermarquart.com](mailto:thuggins@bakermarquart.com)>  
**Cc:** Sam Ferguson <[sam@meadefirm.com](mailto:sam@meadefirm.com)>, Seena Forouzan <[seena@meadefirm.com](mailto:seena@meadefirm.com)>, Brian Klein <[bklein@bakermarquart.com](mailto:bklein@bakermarquart.com)>, Donald Pepperman <[Dpepperman@bakermarquart.com](mailto:Dpepperman@bakermarquart.com)>

**Subject:** Re: Winklevoss Capital Fund, LLC v. Charles Shrem: Subpoenas

I'll accept service, but reserve all rights to object (except as to service).



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**From:** Teresa Huggins <[thuggins@bakermarquart.com](mailto:thuggins@bakermarquart.com)>  
**Date:** Friday, March 15, 2019 at 3:53 PM  
**To:** Tyler Meade <[tyler@meadefirm.com](mailto:tyler@meadefirm.com)>  
**Cc:** Sam Ferguson <[sam@meadefirm.com](mailto:sam@meadefirm.com)>, Seena Forouzan <[seena@meadefirm.com](mailto:seena@meadefirm.com)>, Brian Klein <[bklein@bakermarquart.com](mailto:bklein@bakermarquart.com)>, Donald Pepperman <[Dpepperman@bakermarquart.com](mailto:Dpepperman@bakermarquart.com)>  
**Subject:** Winklevoss Capital Fund, LLC v. Charles Shrem: Subpoenas

Tyler,

Please let us know if you will accept service for the attached subpoenas.

Thank you,  
Teresa Huggins  
Baker Marquart LLP  
(424) 652-7813